

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION OF)	
DELMARVA POWER & LIGHT COMPANY FOR)	PSC Docket No. 17-1094
APPROVAL OF A PROGRAM FOR PLUG IN)	
VEHICLE CHARGING)	

PETITION TO INTERVENE OF SIERRA CLUB

Pursuant to 26 Del. Admin. Code 1001-2.9.1, the Sierra Club respectfully petitions to intervene in the above-captioned docket.

1. Joshua Berman (representative for Sierra Club)

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2. The Sierra Club is a national grassroots environmental organization founded in 1892 with more than 830,000 members nationwide and over 2,000 members in the State of Delaware. Sierra Club works to promote a cleaner, healthier, and more sustainable natural environment by rapidly replacing fossil-fuel generation in the electric sector with energy efficiency and carbon-free renewable, and accelerating the electrification of the transportation sector by working to eliminate barriers to electric vehicle adoption. In the context of proceedings before state public service commissions regarding electric vehicle charging infrastructure proposals, the Sierra Club works to promote its ratepayer members' interest in bill-sensitive policies that further their environmental and climate objectives, including effectively using price signals and load management practices to maximize benefits to the system, electricity customers and electric vehicle drivers, and facilitating the integration of renewable resources; providing equitable deployment of

services, including commitments to disadvantaged communities; fostering a competitive market and the engagement of third party vendors of electric vehicle charging infrastructure and services in a manner that supports continued growth of the broader electric vehicle charging industry; and increasing access to electric vehicle charging beyond single-family homes with a focus on multi-family dwellings, workplaces, and public high-power “fast charge” locations, in order to improve electric vehicle adoption and awareness.

3. Sierra Club’s interests are distinct from and are not adequately represented by the other parties or pending intervenors in this docket. None of the other parties or intervenors shares the Sierra Club’s climate protection and air quality goals, which inform the Sierra Club’s position on electric vehicle rates and utility investment in electric vehicle charging infrastructure. Further, none of the other parties shares the Sierra Club’s dual interests in promoting deployment of electric vehicle charging infrastructure while mitigating impacts to ratepayers and ensuring benefits to disadvantaged communities.

Moreover, participation of the Sierra Club would be in the public interest. Sierra Club has appeared before state public utility commissions and constructively participated in dockets regarding utility electric vehicle charging infrastructure proposals in states across the country including California (San Diego Gas & Electric, Pacific Gas & Electric, and Southern California Edison), the District of Columbia (Pepco), Massachusetts (Eversource, National Grid), Michigan (Consumers Energy), Missouri (Kansas City Power & Light, Ameren), and Utah (Rocky Mountain Power). The Sierra Club has also participated in state public service commission dockets regarding electric vehicle rates and rate structures including in dockets in Connecticut, Missouri, and Nevada, and is actively participating in informal commission proceedings through which utility electric vehicle charging infrastructure proposals are being developed in Maryland and New Jersey.

4. The Sierra Club is broadly supportive of Delmarva’s proposal, although anticipates offering recommendations to strengthen the proposal. The Sierra Club anticipates recommending approval of Delmarva’s proposal subject to those recommendations.

WHEREFORE, Sierra Club respectfully requests that the Commission allow it to intervene in this matter.

Dated: November 30, 2017

Respectfully submitted,

/s/ Kenneth T. Kristl
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing PETITION TO INTERVENE OF SIERRA CLUB to be served upon the following persons:

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via electronic mail this 30th day of November, 2017.

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